

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

**CARLOS A. GARCIA-PEREZ,
et al.,**

Plaintiffs,

v.

ALVARO SANTAELLA, MD, et al.,

Defendants.

Civil No. 97-1703 (JAG)

**PLAINTIFFS' MOTION NOTIFYING EXPERT WITNESS
AND REQUEST FOR EXTENSION TO NOTIFY OTHERS**

TO THE HONORABLE COURT:

COME NOW the plaintiffs, through the undersigned attorneys, and to this Honorable Court respectfully state and pray:

1. Pursuant to the deadline established in the August 24, 2004 Status Conference, plaintiffs are hereby announcing their life care plan expert, Ro Baltayan, of Jupiter, Florida.
2. Plaintiffs are in the process of reaching an agreement with an expert in the field of neuropsychology. Also, due to the Magistrate Judge's recent Report and Recommendation determining that the obstetrician Dr. de la Vega will not be dismissed from the case, plaintiffs are considering retaining an expert in the field of obstetrics.
3. Plaintiffs are also considering retaining an expert in the medical insurance industry since there seems to be a difference of opinion amongst the parties as to the interpretation of the

defendants' insurance policies.

4. Plaintiffs are in need of an additional thirty (30) days in order to retain the above experts.

WHEREFORE, plaintiffs respectfully request that this Honorable Court take note of the above and also grant plaintiffs thirty (30) days, up to and including October 25, 2004, to retain the additional experts.

Respectfully submitted.

In San Juan, Puerto Rico, this 22nd day of September, 2004.

I HEREBY CERTIFY: That I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to Pedro J. Córdova, Esq., P.O. Box 9023998, San Juan, Puerto Rico 00902-3998; Angel R. de Corral-Juliá, Esq., De Corral & De Mier, 130 Eleonor Roosevelt, San Juan, Puerto Rico 00918-3105; Marta E. Vilá-Báez, Esq., Sánchez, Betances & Sifre, P.O. Box 195055, San Juan, Puerto Rico 00919-5055; Roberto Ruiz-Comas, Esq., González Pando Plaza, 1181 Jesús T. Piñeiro Avenue, San Juan, Puerto Rico 00920-5604; José Enrique Otero, Esq., P.O. Box 9023933, San Juan, Puerto Rico 00902-3933; José Héctor Vivas, Esq., Vivas & Vivas, P.O. Box 330951, Ponce, Puerto Rico 00733-0951; Igor J. Domínguez, Esq., 652 Muñoz Rivera Avenue, Suite 3125, Hato Rey, Puerto Rico 00918-4261; Doris Quiñones-Tridas, Esq., 113 Padre Las Casas, Suite 601, Urb. El Vedado, San Juan, Puerto Rico 00918-3116; Pedro Toledo-González, Esq., Julio Bogoricin Building, Office L-06, Lobby, 1606 Ponce de León Avenue, Santurce, Puerto Rico 00909.

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